

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

Case No. 9:23-cv-81373- MIDDLEBROOKS-MATTHEWMAN

CONSUMER FINANCIAL PROTECTION BUREAU  
Plaintiff,

vs.

FREEDOM MORTGAGE CORPORATION,  
Defendant.

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**JOINT STATUS UPDATE REGARDING PLAINTIFF'S SUPPLEMENTAL RESPONSE  
TO DEFENDANT'S INTERROGATORY NO. 12**

Plaintiff Consumer Financial Protection Bureau ("Bureau") and Defendant Freedom Mortgage Corporation ("Freedom") (jointly, "the Parties") submit this Joint Status Update addressing the Bureau's Supplemental Response to Freedom's Interrogatory No. 12 ("Supplemental Response"). The Parties are submitting this Joint Status Update in accordance with the Court's Order Granting in Part and Denying in Part Defendant's Motion to Compel Discovery of Information Regarding Civil Money Penalties. Dkt. 89.

In accordance with the Court's Order, the Bureau served Freedom with its Supplemental Response on May 31. The Bureau's Supplemental Response confirms that the Bureau is not seeking damages in this case, identifies the total civil money penalties it seeks, and the method of calculation thereof. As described in the Bureau's Supplemental Response, while the Consumer Financial Protection Act of 2010 does not provide a precise mathematical calculation to determine the appropriate penalty in any given case, a court shall consider the statutory factors in

12 U.S.C. § 5565(c)(3) for that determination. The Bureau's Supplemental Response includes a detailed presentation of the Bureau's position concerning each of those statutory factors in this case.

The Parties met and conferred regarding the Bureau's Supplemental Response earlier on June 3. During that conferral, Freedom stated that it did not have any questions with respect to the Bureau's Supplemental Response, and that the Supplemental Response was fulsome. Freedom did not raise any objections to the Bureau's Supplemental Response.

Dated: June 3, 2024

Respectfully Submitted,

/s/ Herman J. Russomanno  
Herman J. Russomanno III  
Fla. Bar No. 21249  
herman2@russomanno.com

RUSSOMANNO & BORRELLO, P.A.  
Local Counsel for Defendant  
Freedom Mortgage Corporation  
Museum Tower – Penthouse 2800  
150 West Flagler Street  
Miami, Florida 33130  
Telephone: (305) 373-2101  
Facsimile: (305) 373-2103

Mitchel H. Kider  
Timothy P. Ofak  
Charles Cooper  
Joseph Katz

WEINER BRODSKY KIDER PC  
1300 19th Street NW, Fifth Floor Washington, DC 20036  
Tel: (202) 628-2000  
Fax: (202) 628-2011  
kider@thewbkfirm.com ofak@thewbkfirm.com  
cooper@thewbkfirm.com  
katz@thewbkfirm.com

*Attorneys for Defendant*

/s/ Emily Holness

Emily Holness

Special Florida Bar ID A5503128

New York Bar No. 4947941

Charles Mothander

Special Florida Bar ID A5503180

DC Bar No. 1032539

Hallie Ryan

Special Florida Bar ID A5503127

Virginia Bar No. 85927

Joseph Lake

Special Florida Bar ID A5503154

California Bar No. 246679

Samuel Weinstock

Special Florida Bar ID A5503195

Maryland Bar No. 2211290261

*Enforcement Attorneys*

Consumer Financial Protection Bureau

1700 G Street, NW Washington, DC 20552

Email: emily.holness@cfpb.gov

Email: charles.mothander@cfpb.gov

Email: hallie.ryan@cfpb.gov

Email: joseph.lake@cfpb.gov

Email: samuel.weinstock@cfpb.gov

*Attorneys for Plaintiff*